

Comments Submitted on  
National Animal Identification System Strategic Plan  
by  
Alabama Cattlemen's Association  
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**Introduction**

Alabama Cattlemen's Association (ACA) is a 65 year old trade association whose 12,500 plus members represent the \$2 billion cattle industry in Alabama. The ACA has been actively involved with discussions in developing the National Animal Identification System (NAIS). We are grateful for USDA's willingness to get industry input into a process that could have a major impact on our industry. NAIS is one of the most significant occurrences in the nation's livestock industry.

Animal health and disease surveillance for the beef industry has been a long and well established partnership between the industry and state and federal animal health officials. ACA supports the concept outlined in NAIS of having a 48 hour animal disease traceback system that will insure that infected and exposed animals are contained and eradicated as quickly as possible.

In Alabama, our cattle producers primarily have cow-calf operations and sell calves at weaning. Most of our 25,000 producers are part time with small herds. Over 90% of these calves are marketed through auction markets. ACA, representing these stakeholders, agrees with many of the concerns identified in the NAIS draft document.

**Confidentiality**—The ACA has listened to producers and one of their major concerns is confidentiality of data. Producers believe this can only be achieved by the creation of a private centralized database held in the private sector which could be accessed by APHIS only when needed and only for the information necessary for traceback and animal health concerns. Further, we feel a private database would be much more cost effective than a government operated database. In addition, a private database would allow producers to utilize the same identification system for management records as well.

**Animal Movement**—In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to premises where they are to be commingled with other animals, such as the sale barn. In Alabama a high percentage of our producers do not have facilities on their own farms to tag or individually identify animals. We believe that auction markets will have a major role in identifying animals as they enter commerce. However, currently our auction markets do not have the facilities, labor or time to handle tagging cattle on sale day without causing real bottlenecks.

**Premises Identification and Tag Distribution-** ACA has strongly supported the Alabama Department of Agriculture's efforts to get producers to voluntarily register premises. Over 1,000 have already been registered in Alabama. We are concerned that the registration database system appears to be quite cumbersome and requires significant time and resources to register premises in a timely fashion. ACA feels that it is important to have readily available a source of EID tags. This is important to the success of NAIS.

**Funding**—ACA encourages federal funding be made available to assist with the infrastructure necessary to tag and scan cattle and enter the data into the system at the auction markets. We also support federal funding for producer education programs through coalitions such as the Southeast Livestock Network.

**Conclusion**—ACA thanks APHIS for providing the industry an opportunity to comment on NAIS. We encourage APHIS to sincerely consider industry's input and continue working with industry to resolve their concerns. By doing so, NAIS can accomplish its 48 hour traceback goal, while being user friendly, not costly nor disruptive to normal commerce. Only then will the much needed producer buy-in be achieved. ACA agrees in principle with the detailed discussion points addressing USDA's questions on the NAIS strategic plan draft provided by SLN, TSCRA and NCBA.

We look forward to continuing to work with state and federal governments on helping NAIS achieve its goals.

Submitted by:  
William E. Powell, III, PhD  
Executive Vice President  
Alabama Cattlemen's Association  
PO Box 2499  
Montgomery, AL 36102-2499  
[bpowell@bamabeef.org](mailto:bpowell@bamabeef.org)  
334/265-1867